



THE RUSSELL FRIEDMAN
LAW GROUP, LLP

Application granted. Revised Rule 56.1 Statement and Plaintiff's response to Defendants' pre-motion letter shall be filed by 10/12/2022.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
September 30, 2022

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VIA ECF

Hon. Philip M. Halpern
The Hon. Charles L. Brieant, Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re. **Michael Bayer, et al. v. County of Dutchess, et al.**
Docket No.: 7:19-cv-03383 (PMH)(AEK); File No.: L2683

Dear Judge Halpern:

The Russell Friedman Law Group, LLP represents Plaintiffs in connection with the above-referenced action. The present application is a joint request. This is the parties' third request for an extension of time.

I am compelled to write to the Court to respectfully request that the time within which the parties are to file the joint Rule 56.1 statement be extended until October 12, 2022. Plaintiffs further request that the time for them to file their response to Defendants' pre-motion letter also be similarly extended.

At present, the joint Rule 56.1 statement and Plaintiffs' response to Defendants' pre-motion letter is due today. The reason for the request is that undersigned just received comments to Plaintiffs' proposed revisions to the 56.1 statement this morning and, as such, I do not have the time necessary to review Defendants' comments. While the parties do not anticipate further delays in finalizing the 56.1, the parties will not complete it by today's deadline. Based upon the foregoing, we would respectfully request the additional time to finalize the 56.1 statement so that Plaintiffs may prepare an appropriate response to Defendants' pre-motion letter with the benefit of a final 56.1 statement.

As such, it is respectfully requested that the time within which to file the joint 56.1 statement and Plaintiffs' response to Defendants' pre-motion letter be extended until October 12, 2022.



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Thanking the Court for its time and consideration, I remain

Respectfully,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

/S Pablo A. Fernandez
Pablo A. Fernandez

PAF/dm

cc: Kimberly Hunt-Lee, Esq. (via ECF)
Attorney for Defendants